REMARKS

This response is to the Office Letter mailed in the above-referenced case on June 27, 2001. In the Office Letter the Examiner has rejected claims 1-10 under 35 U.S.C. 103(a) as being anticipated by Kikinis (US 5,727,159) hereinafter Kikinis.

The applicant has carefully noted and reviewed the Examiner's rejections, references and comments. Applicant herein makes amendments to the claims to correct errors, not greatly affecting the scope of the limitations. Applicant argues the patentability of the claims over the art of Kikinis as the reference clearly and unarguably fails to support the 103(a) rejection presented by the Examiner.

Regarding claim 1, the Examiner states that Kikinis teaches the invention as claimed, including a communication center having agent workstations, a system for enabling a remote agent , using a light computerized device having insufficient power to operate as an agent with full access to data and software tools of the communication center (Fig. 2), the system comprising a proxy server, a first two way data link between the proxy server and one of a server or a workstation at the communication center (col. 4, lines 15-34), a second two way data link between the proxy server and the light computerized device used by the remote agent (col. 5, lines (col. 5, line 34-52) , characterized in that the proxy server, by the software suite, upon establishing a connection over the second data link, establishes a connection to a server or a workstation at the communication center over the first two way data link at the direction of the light

computerized device, accesses data and operates software from the workstation at the communication center on behalf of and according to direction from the light computerized device (col. 5 line 62 - col. 6, line 36).

The Examiner admits that Kikinis fails to teach the connection to a workstation in a communication center as claimed. The Examiner takes "Official Notice" that a workstation operating as a server is well known in the art. The Examiner states it would have been obvious to combine the well known teachings of Kikinis to use a workstation to provide server functions because it would reduce the cost compared to the cost of using a mainframe.

Applicant argues that the Examiner did not fully consider applicant's limitations as claimed. Applicant claims accessing data and operating software from the workstation at the communication center on behalf of and according to direction from the light computerized device. Kikinis also fails to teach or suggest this feature. Applicant argues that Kikinis is limited to accessing data at WEB sites by connecting to a WEB server and downloading files.

Applicant argued this point in the previous amendment wherein the argument was made that Kikinis does not teach the connection of a proxy server to a workstation at a communication center over a first two-way data link at direction of the light computerized device, or accessing data and operating software from the workstation at the communication center on behalf of and according to direction from the light computerized device, as claimed.

The Examiner responded to the argument stating that Kikinis teaches that a user uses a hand held computer to remotely access data and capability of remotely executing a host of routines stored in a server (col. 4, lines 15-64, and col. 5 line 62-col. 6 line 36).

Firstly, applicant points out that applicant does not claim capability of remotely executing a host of routines stored in a server. Applicant claims

connecting to a workstation at a communication center accessing data and operating software from the workstation at the communication center on behalf of and according to direction from the light computerized device. Applicant's claimed functional limitation at the workstation at the communication center has far more capability for the light computerized device than that of Kikinis.

Applicant has studied the portions of Kikinis referenced by the Examiner and has found that Kikinis does not teach or suggest the operations at a workstation as claimed in applicant's invention. Column 6 lines 17-27 of Kikinis clearly states; *"Following the example of a command communicated over link 15 from computer 13 for accessing a WEB page (typically a Universal Resource Locator (URL), Proxy-Server 19 accesses the appropriate server (in this case server 23) over link 21, and downloads the appropriate data over link 21. Proxy-Server 19 therefore has HTML and TCP/IP capability, and typically has access to and <u>capability of executing a host of other routines as known in the art for supporting WEB browsing</u> and accessing data through the World Wide Web. These routines and this functionality are all very well-known to those with skill in the art."*

Clearly the Examiner's above statement regarding Kikinis' capability was taken out of context. Applicant is not aware that WEB browsing routines include establishing a connection to a workstation at a communication center over a first two-way data link at direction of a light computerized device, accessing data and operating software from the workstation at the communication center on behalf of and according to direction from the light computerized device. If the Examiner has knowledge of WEB browsing routines known in the art capable of applicant's functional claimed limitation at the workstation then it must be presented as prior art. Kikinis fails to teach or suggest applicant's said limitation.

Applicant understands that in order to substantiate a proper prima

facie case of obviousness the prior art reference (or references when combined) must teach or suggest all the claim limitations. Kikinis fails to do so. Applicant traverses the Examiner's "Official Notice" and requests that prior art be presented showing the connection from a proxy server to the workstation at the communication center, including the functionality of accessing software, downloading data etc. as claimed.

Both the suggestion to make the claimed combination and the reasonable expectation of success must be founded in the prior art and not in applicant's disclosure. There is absolutely no suggestion, or motivation in the art of Kikinis for connecting to a workstation at a communication center, and performing operations as claimed. The Examiner's stated motivation supporting the obviousness rejection relies on the cost savings of using a workstation instead of a mainframe computer. Neither Kikinis nor applicant's invention consider cost savings as a problem and seek to create a solution for that problem. There is no art, to applicant's knowledge, wherein a proxy server, having a connection to a light computerized device, connects to a mainframe at a communication center performing the functions as claimed in applicant's invention. Therefore, the Examiner's reasoning is unfounded.

As previously argued columns 5 and 6 of Kikinis specifically states that proxy server 19 performs functions enabling hand-held computer 13 to operate as a powerful Web-browsing machine. Kikinis teaches that the proxy server connects to an appropriate server, and accesses and downloads data. Kikinis specifically teaches the proxy server 19 acts as a proxy for computer 13, performing those functions of Web browsing computer 13 cannot perform. Applicant urges that Kikinis discloses a teaching limited to Web browsing.

Applicant believes that it is not proper for the Examiner to read more into the teaching of Kikinis than what is actually taught. The Examiner must show in the reference where Kikinis teaches the argued

limitation. Kikinis does not teach the ability of the proxy server to establish a connection to a workstation at a communication center over a first two-way data link at direction of the light computerized device, <u>accessing data and operating software from the workstation at the communication center on behalf of and according to direction from the light computerized device.</u>

Applicant believes claim 1 is patentable over the art of Kikinis as argued in detail above. Claims 2-6 are patentable on their own merits, or at least as depended from a patentable claim.

Claim 6 is applicant's method claim corresponding to independent claim 1. Claim 6 <u>also recites</u> the proxy server connecting to the workstation at the communication center, accessing data and software on behalf of the lite computerized device. Therefore, method claim 6 is also patentable as argued on behalf of claim 1. Claims 7-10 are patentable on their own merits, or at least as depended from a patentable claim.

In view of the above arguments, it is clear that the reference of Kikinis does not anticipate or suggest the invention as herein claimed. It is therefore respectfully requested that this application be reconsidered, the claims be allowed, and that this case be passed quickly to issue. In a next action, the applicant specifically requests that the Examiner point out exactly where in Kikinis, or any other reference, the limitations of the claims are taught.

If there are any time extensions needed beyond any extension specifically requested with this amendment, such extension of time is hereby requested. If there are any fees due beyond any fees paid with this amendment, authorization is given to deduct such fees from deposit account 50-0534.

Version With Markings to Show Changes Made

1. (Twice Amended) In a communication center having agent workstations, a system for enabling a remote agent, using a light computerized device having insufficient power to operate as a workstation of the communication center, to access and operate as an agent with full access to data and software tools of the communication center, the system comprising:

    a proxy server executing a software suite;

    a first two-way data link between the proxy server and [one of a server or] a workstation at the communication center; and

    a second two-way data link between the proxy server and the light computerized device used by the remote agent;

    characterized in that the proxy server, by the software suite, upon establishing a connection over the second data link, ascertains hardware and software characteristics of the light computerized device, establishes a connection to a workstation at the communication center over the first two-way data link at direction of the light computerized device, accesses data and operates software from the workstation at the communication center on behalf of and according to direction from the light computerized device, transforms the data and results of the software operations into a form useable by the light computerized device, and transmits the transformed information to the light computerized device via the second two-way data link.
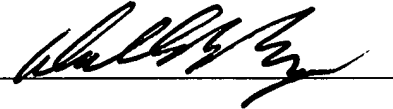
8. (Unchanged) The method of claim 6 wherein the proxy server is a LAN-connected server in the communication center, the [first] <u>second</u> two-way data link being the communication center LAN.

9. (Amended) The method of claim 8 wherein the [second] <u>first</u> two-way

data link is one of a dial-up telephone connection, a wireless connection, or a data-packet connection via the Internet.

Respectfully Submitted,
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by_____

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